

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HENRY H. BRECHER, Individually And On .
Behalf Of All Others Similarly Situated, .

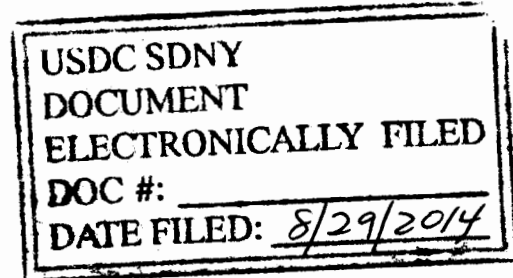
Plaintiff, .

v. .

REPUBLIC OF ARGENTINA, .

Defendant. .
----- X

No. 06 CV 15297 (TPG)



**[PROPOSED] ORDER GRANTING MOTION TO MODIFY CLASS
DEFINITION AND CERTIFYING MODIFIED CLASS**

WHEREAS, the Plaintiffs move pursuant to Fed. R. Civ. P. 23(c)(1)(C) to modify the existing class definition to encompass, as modified, a class consisting of all holders of Republic of Argentina European Medium Term Note Bond, with a coupon rate of 9.25% and a maturity date of July 20, 2004 (ISIN XS011 3833510) (the "Holder Class").

WHEREAS, the motion was fully briefed and a conference was held on February 21, 2014, at which counsel for Plaintiffs and counsel for the Republic of Argentina ("Argentina") appeared and had further opportunity to address the motion;

NOW, THEREFORE, the Court, having considered all papers, arguments, and proceedings had herein;

IT IS HEREBY ORDERED THAT:

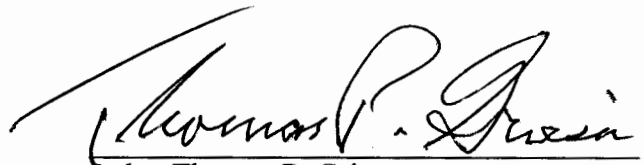
1. The Court finds: There is good and sufficient cause to modify the existing class definition to encompass the Holder Class; modification of the class definition will serve the interests of justice and will not prejudice Argentina or any holder; the Holder Class satisfies the requirements of Rule 23 (including numerosity, commonality, typicality, and fair and adequate representation) and is ascertainable by reference to objective criteria; and the requirements of

Fed. R. Civ. P. 23(b)(3) and 23(c)(2)(B) will be satisfied, and Due Process rights of actual and potential Holder Class members will be protected, by notice and opt-out procedures.

2. The Court therefore GRANTS Plaintiffs' motion to modify the class definition to encompass, as modified, "all holders of Republic of Argentina European Medium Term Note Bond, with a coupon rate of 9.25% and a maturity date of July 20, 2004 (ISIN XS0113833510)," a "holder" being an owner of a beneficial interest in said bonds. Excluded from the Holder Class are all holders to the extent that their holdings (a) are the subject of a separately pending lawsuit or claim in arbitration to collect on such holdings or (b) have been exchanged for new bonds or otherwise extinguished. Holders that timely opt out pursuant to the attached procedures also will be excluded from the Holder Class.

3. The Court hereby appoints Hagens Berman Sobol Shapiro LLP and Steve W. Berman and Jeniphr A.E. Breckenridge as co-Class Counsel for the Holder Class and Henry H. Brecher as the Class Representative.

DATED: 8/29/14



Judge Thomas P. Griesa
U.S.D.J.